### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA
v.

JACOB S. MUNROE

Defendant.

1:20CR46-JJM-LDA

Cr. No. \_

In violation of 18 U.S.C. § 2252(a)(2) (Distribution of Child Pornography) and § 2252(a)(4) (Possession of Child Pornography)

### INDICTMENT

The Grand Jury charges:

# COUNT 1 (Distribution of Child Pornography)

On or about November 20, 2018, in the District of Rhode Island and elsewhere, the defendant, JACOB S. MUNROE, did knowingly distribute a visual depiction using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed, shipped, and transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

All in violation of 18 U.S.C. § 2252(a)(2).

## COUNT 2 (Possession of Child Pornography)

On or about June 5, 2019, in the District of Rhode Island and elsewhere, the defendant, JACOB S. MUNROE, did knowingly possess, and access with intent to view, one or more matters which contained a visual depiction, that had been shipped and

transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer, the production of which involved the use of a minor who had not attained 12 of age engaging in sexually explicit conduct, and the visual depiction was of such conduct.

All in violation of 18 U.S.C. §2252(a)(4) and (b)(2).

### Forfeiture Allegations

As a result of the offenses alleged in this Indictment, pursuant to 18 U.S.C. § 2253 and 21 U.S.C. § 853 as specified at 18 U.S.C. § 2253(b), the defendant, JACOB MUNROE, shall forfeit to the United States of America any and all property constituting visual depictions as described in 18 U.S.C. § 2253(a)(1); any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense as described in 18 U.S.C. § 2253(a)(2); and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or

any property traceable to such property as described in 18 U.S.C. § 2253(a)(3).

A TRUE BILL:

AARON L. WEISMAN

United States Attorney

SANDRA HEBERT

Assistant U.S. Attorney

Deputy Chief of the Criminal Division

TERRENCE P. DONNELLY

Assistant U.S. Attorney

Grand Jury Foreperson

7/12/2000.